

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JERRY GORALSKI LAMB,

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Plaintiff,

*

v.

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Civ. No. PX-16-2705

**COMMANDER, NAVAL AIR
SYSTEMS COMMAND, PAUL
GROSKLAGS, et al.,**

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Defendants.

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MOTION FOR EXTENSION OF TIME

The defendants, by undersigned counsel, submit this motion for extension of time to file a response to the Amended Complaint to and including August 25, 2017, and state as follows:

1. On July 27, 2016, Plaintiff filed his initial Complaint. ECF No. 1. Summonses were issued but not served. On October 27, 2017, Plaintiff filed a motion for extension of time to amend his Complaint and effectuate service, ECF No. 4, which, on November 1, 2016, this Court granted, ECF No. 5. On November 28, 2016, Plaintiff filed the Amended Complaint. ECF No. 6. On January 31, 2017, Plaintiff filed a second motion for extension of time to effectuate service, ECF No. 7, which, on February 13, 2017, this Court granted, ECF No. 8. On April 10, 2017, the United States Attorney was served. The defendants' response to the Amended Complaint, initially was due on or before June 9, 2017.

2. On June 7, 2017, the defendants filed a motion for extension of time to file a response to the Amended Complaint. ECF No. 13. That motion remains pending.

3. The defendants anticipate filing a motion to dismiss, which undersigned counsel is in the process of preparing. The schedule of undersigned counsel, in addition to the competing demands of other cases, however, will make it difficult to meet the presently proposed August 8,

2017, deadline. The defendants are confident that they will be able to file their motion to dismiss within the amount of time requested by the present motion.

4. The defendants have not contacted the *pro se* Plaintiff about this motion. The requested 17 days, however, will do no unfair prejudice to Plaintiff, who also has enjoyed the benefit of several extensions of time, as noted above.

WHEREFORE, the defendants respectfully request that this Court grant their motion and extend their deadline to file a response to the Amended Complaint to and including August 25, 2017.

Respectfully submitted,

Stephen M. Schenning
Acting United States Attorney

/s/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 4th day of August 2017, the foregoing Motion for Extension of Time was electronically filed and served on Plaintiff via the Court's CM/ECF system.

_____/s/
Kelly M. Marzullo (Bar No. 28036)
Assistant United States Attorney